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TO RUEHHE/AMEMBASSY HELSINKI 0000
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INFO RUEAIIA/CIA WASHINGTON DC 0000
RUCPDOG/USDOC WASHINGTON DC 0000
RUEKJCS/SECDEF WASHINGTON DC
RHMCSUU/FBI WASHINGTON DC 0000
RUEPINS/HQ BICE INTEL WASHINGTON DC

UNCLAS STATE 033991

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HELSINKI FOR GLENN LEWIS
TALLINN FOR ROBERT HOLLISTER

E.O. 12958: N/A
TAGS: [EN](#) [ETTC](#) [FI](#) [KOMC](#)
SUBJECT: BLUE LANTERN LEVEL 3: PRE-LICENSE END-USE CHECK
ON APPLICATION 050093640

REF: BLUE LANTERN GUIDEBOOK 2006

¶1. This is an Action Request. See paragraphs 2-4.

¶2. The Department's Office of Defense Trade Controls Compliance (PM/DTCC) requests posts' assistance in conducting a pre-license check on application 050093640 for the export of underwater breathing equipment to Estonia. Posts are requested to complete this Blue Lantern check within 30 days. Lack of response to a Blue Lantern check will affect pending and future applications involving parties to this license.

¶3. Reason for request: Unfamiliar foreign consignee, Polarsukellus Oy. Posts should make appropriate inquiries to verify the bona fides of Polarsukellus Oy and confirm the legitimacy of the proposed transaction. The following questions are provided as suggested guidance:

For the Estonian MOD:

--Did you order from Polarsukellus Oy the exact type and quantity of items listed on this application?

--Is Polarsukellus Oy an official supplier/contractor for the Finnish MOD? Does the MOD have any other contracts with the company?

For Polarsukellus Oy:

--Does the company have proper supporting documentation, including purchase orders from the Finnish MOD, for this proposed transaction?

--Will the company be handling or storing the items listed on the application? If so, does it have secure facilities and proper accounting and security procedures for handling these sensitive USML items?

--When was the company established and who are its principals?

--What is the nature of its business -- what types of items does it handle, does it serve as a broker?

--What types of organizations are among its typical customers and where are the customers located? Does the company have an established customer base?

--Does the company keep proper, detailed records of its sales and customers?

--Does the company understand the restrictions on United States Munitions List (USML) items, especially the prohibition against unauthorized re-transfers and re-exports?

¶4. Department requests that posts conduct a site visit to the company in order to provide Department with an assessment of its business operations and on-site security. If a site visit is not possible, please inform PM/DTCC case officer. Finally, post is asked to assess whether the company appears to be a reliable recipient of USML items. End action.

¶5. For background, the following details of the license in question are provided:

DTC Case: 050093640

QUANTITY/COMMODITY:

2 P/N 2400-xxxx 58FS Viper SC.

2 P/N 2400-xxxx 58FSVSC2Y Viper SC Spare Parts (Soft Goods Kits)

License Value: USD \$69,972.00

SELLER:

Cobham Holdings Inc.
10 Cobham Drive
Orchard Park, NT 14127

Subsidiary:

Carleton Life Support Systems
2734 Hickory Grove Road
Davenport, IA 52804

FOREIGN CONSIGNEE:

Polarsukellus Oy
Rusthollarinkatu 8
FIN 02270 Espoo
Finland
Tel 358-9-613316

Ministry of Defense Republic of Estonia Army Diving Unit
Sakala 1
15094 Tallinn
Estonia

FOREIGN END-USER:

Ministry of Defense - Republic of Estonia
Sakala 1
15094 Tallinn
Estonia

PURPOSE:

For use by the Estonian Army in counter terrorism, explosive ordnance disposal, and underwater mine countermeasures.

¶6. Submitted in support of the license application were the following documents (PM/DTCC can fax documentation to post upon request):

- Purchase Order No. UM107-020777-1 from Polarsukellus Oy.
- End-Use Statement from Polarsukellus Oy listing Ministry of Defense - Republic of Estonia as end-user. Signed by Egil Osterholm dated 03/05/2008.
- Product Brochures and Technical Data
- Letter of Explanation from Carleton Life Support Systems to PM/DDTC dated 03/06/2008 signed by Kathleen K. Nimrick

¶7. Please slug reply for PM/DTCC - BLUE LANTERN COORDINATOR

and include the words "Blue Lantern" and the case number in the subject line. POC is Judd Stitzziel, PM/DTCC, Phone: 202-663-3455; email: StitzzielJD@state.gov; SIPRNET: StitzzielJD@state.sgov.gov. The Blue Lantern Guidebook (ref) is available as a PDF file in the Bunche Library's Electronic Library collection on the DOS Intranet: [http://virtuallibrary.state.gov/BlueLanternGuidebook2006%2520 final .pdf](http://virtuallibrary.state.gov/BlueLanternGuidebook2006%2520%20final.pdf)

18. Department is grateful for post's assistance in this matter.
RICE